

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (AKRON)

CARMEN ELECTRA, et al.,	:	Case No. 5:18-cv-02706
	:	
Plaintiffs,	:	
	:	Judge Sara Lioi
v.	:	
	:	
DREAMERS CABARET, LLC, et al.,	:	
	:	
Defendants.	:	

JOINT MOTION FOR 30-DAY EXTENSION OF DISCOVERY DEADLINES

In accordance with Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure, the Parties jointly and respectfully request that the Court extend the discovery deadlines by 30 days. The good cause for this request is as follows:

Attorney Medvick has recently taken over representation of the Defendant, 1110 Brittain Road, LLC, with the withdrawal of prior counsel, Matthew Cavanagh. Since this change in representation, the parties continue to be engaged in settlement discussions, and are hopeful that a resolution can be reached. However, the approaching discovery deadlines would involve expenditure by the parties which would be a potential impediment to resolution of this matter, and the parties jointly move for a brief extension of the schedule in order to attempt to reach settlement of these claims without the necessity of such expense.

Accordingly, the Parties respectfully request a modification to the Scheduling Order that extends all deadlines by approximately 30 days as follows:

<i>Event</i>	<i>Current Date</i>	<i>Proposed New Date</i>
Deadline for Completing Non-Expert Discovery	April 2, 2021	May 3, 2021
Deadline to identify Experts and provide reports	April 2, 2021	May 3, 2021
Deadline to identify rebuttal Experts and provide reports	May 7, 2021	June 1, 2021
Deadline for completing Expert discovery	June 11, 2021	July 9, 2021
Deadline for filing Dispositive Motions	June 18, 2021	July 16, 2021
Deadline for filing Oppositions to Motions	July 9, 2021	July 30, 2021
Deadline for filing replies to responses	July 23, 2021	August 13, 2021
Telephone Status Conference	April 2, 2021	April 2, 2021 (unchanged)
Final Pre-Trial Conference	October 22, 2021	October 22, 2021 (unchanged)
Jury Trial set on two week standby	November 29, 2021	November 29, 2021 (unchanged)

The Parties respectfully request that the Court grant their Joint Motion to Extend Discovery Deadlines.

Dated: March 12, 2021

Respectfully submitted,

s/ Joseph N. Casas (per consent)

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